# Chapter 6
# Federal Facility Cleanups

Departments and agencies of the federal government manage a vast array of industrial activities at 27,000 installations. Due to the nature of such activities, whether they are federally or privately managed, federal installations may be contaminated with hazardous substances. Generally, contaminated facilities are subject to CERCLA requirements.

Although federal facilities comprise only a small percentage of the community regulated under CERCLA, federal facilities are usually larger and more complex than their private industrial counterparts. Because of their size and complexity, compliance with environmental statutes at times may present unique management issues for federal facilities.

## 6.1 The Federal Facilities Program

CERCLA Section 120(a) requires that federal facilities comply with CERCLA requirements to the same extent as private facilities. Executive Order 12580 delegates authority to federal departments and agencies, which are responsible for clean-up activities at their facilities. At National Priorities List (NPL) sites, which are sites having the highest priority for remediation under Superfund, CERCLA mandates that cleanups be conducted under an interagency agreement (IAG) between EPA and relevant federal agencies. States are often a party to these agreements as well. To ensure federal facility compliance with CERCLA requirements, EPA not only provides technical advice and assistance but takes enforcement action when appropriate.

Under state statutes, there exists a range of authority and enforcement tools, in addition to CERCLA, that can be used in addressing federal facility compliance with environmental regulations. Federal agency compliance can also be addressed by Indian tribes acting as either lead or support agencies for Superfund response activities.

### 6.1.1 Federal Facility Responsibilities Under CERCLA

Federal departments and agencies are responsible for identifying and addressing hazardous waste sites at the facilities that they own or operate. They are required under CERCLA to comply with all provisions of federal environmental statutes and regulations, as well as all applicable state and local requirements, during site cleanup. This includes Title III, which requires that information on the use or disposal of hazardous substances be reported to EPA and/or the states.

### 6.1.2 EPA's Oversight Role

EPA works primarily through the Office of Federal Facilities Enforcement (OFFE) in the Office of Enforcement (OE) to oversee and assist federal agencies with clean-up activities. EPA responsibilities include evaluating sites for the NPL, negotiating or re-negotiating and amending IAGs, promoting

**Acronyms Referenced in Chapter 6**

| | |
|---|---|
| DOD | Department of Defense |
| DOE | Department of Energy |
| DOI | Department of Interior |
| DOIT | Develop On-Site Innovative Technologies Committee |
| FFERDC | Federal Facilities Environmental Restoration Dialogue Committee |
| GSA | General Services Administration |
| IAG | Interagency Agreement |
| MOU | Memorandum of Understanding |
| NPL | National Priorities List |
| OFFE | Office of Federal Facilities Enforcement |
| ORD | Office of Research and Development |
| PA | Preliminary Assessment |
| RA | Remedial Action |
| RCRA | Resource Conservation and Recovery Act |
| RD | Remedial Design |
| RI/FS | Remedial Investigation/Feasibility Study |
| ROD | Record of Decision |
| RPM | Remedial Project Manager |
| SI | Site Inspection |
| TIO | Technology Innovation Office |

community involvement through site-specific advisory boards, potentially selecting or assisting in the determination of clean-up remedies, concurring with clean-up remedies, providing technical advice and assistance, reviewing federal agency pollution abatement plans, and resolving disputes regarding noncompliance. To fulfill these responsibilities, EPA relies on personnel from Headquarters, Regional offices, and states.

To track the status of a federal facility, EPA uses a number of information systems. The Facility Index System provides an inventory of federal facilities subject to environmental regulations. Through the CERCLA Information System (CERCLIS), EPA maintains a comprehensive list of all reported potential hazardous waste sites, including federal facility sites. CERCLIS also contains clean-up project schedules and achievements for federal facility sites. The list of federal facility sites potentially contaminated with hazardous waste, required by CERCLA 120(c), is made available to the public through the Federal Agency Hazardous Waste Compliance Docket and through docket updates published in the *Federal Register* approximately every six months.

### 6.1.3 The Roles of States and Indian Tribes

Under the provisions of CERCLA Section 120(f), state and local governments are encouraged to participate in the planning and selection of remedial actions taken at federal facility NPL sites within their jurisdiction. State and local government participation includes, but is not limited to, reviewing site information and developing studies, reports, and action plans for the site. EPA encourages states to become signatories to the IAGs that federal agencies must enter into with EPA under CERCLA Section 120(e)(2). State participation in the CERCLA clean-up process is carried out as set forth in CERCLA Section 121.

Cleanups at federal facility sites not on the NPL are carried out by the federal agency that owns or operates the site. Federal agencies use the CERCLA clean-up process outlined in the National Contingency Plan at these sites. These cleanups are subject to state laws regarding removal and remedial actions in addition to CERCLA. A state's role at a non-NPL federal facility site therefore will be determined by that state's clean-up laws, as well as by CERCLA.

CERCLA Section 126 mandates that federally recognized Indian tribes be afforded substantially the same treatment as states with regard to most CERCLA provisions. Thus, the role of a qualifying Indian tribe in a federal facility cleanup would be substantially similar to that of a state. To qualify, a tribe must be federally recognized; have a tribal governing body that is currently performing governmental functions to promote the health, safety, and welfare of the affected population; and have jurisdiction over a site.

## 6.2 Fiscal Year 1993 Progress

OFFE, in conjunction with various other Headquarters offices, Regional offices, and states, ensures federal department and agency compliance with CERCLA and Resource Conservation and Recovery Act (RCRA) requirements. The compliance status of federal facilities is identified on the Federal Agency Hazardous Waste Compliance Docket. The docket contains information regarding federal facilities where hazardous waste is managed or from which hazardous substances have been released.

In recent years, the number of federal facilities listed on the docket and on the NPL has increased. To distinguish the increasing number of federal facilities from non-federal NPL sites, NPL updates list federal facility and non-federal sites separately. This distinction facilitates public awareness of the responsible parties at federal facilities.

CERCLA 120(e)(2) requires that EPA negotiate IAGs at each federal facility listed on the NPL. IAGs are enforceable documents containing, among other things, a review of remedy selection alternatives, schedules of clean-up activities, and dispute resolution provisions.

To keep Congress and the public informed of remedial progress at federal facilities, CERCLA Section 120(e)(5) requires that each federal department or agency, including EPA, furnish an annual report to Congress on progress toward implementing CERCLA at its facilities. EPA's annual report is provided in Section 6.4.

### 6.2.1 Status of Facilities on the Federal Agency Hazardous Waste Compliance Docket

Federal facilities that have areas contaminated with hazardous substances are identified on the Federal Agency Hazardous Waste Compliance Docket, which was established under CERCLA Section 120(c). The docket functions as a comprehensive record of the federal facilities Superfund program. Information submitted to EPA on identified facilities is compiled and maintained in the docket. This information is then made available to the public.

On February 12, 1988, the initial federal agency docket was published in the *Federal Register*. At that time, 1,095 federal facilities were listed. Exhibit 6.2-1 shows the increase in the number of sites on the docket since its first publication. During FY93, 263 sites were added and 59 sites removed in a docket update on February 5, 1993, and 113 sites were added and 98 sites removed in a docket update on November 10, 1993. (Facilities are removed from the docket for such reasons as incorrect reporting of hazardous waste activity or transfer from federal ownership.)

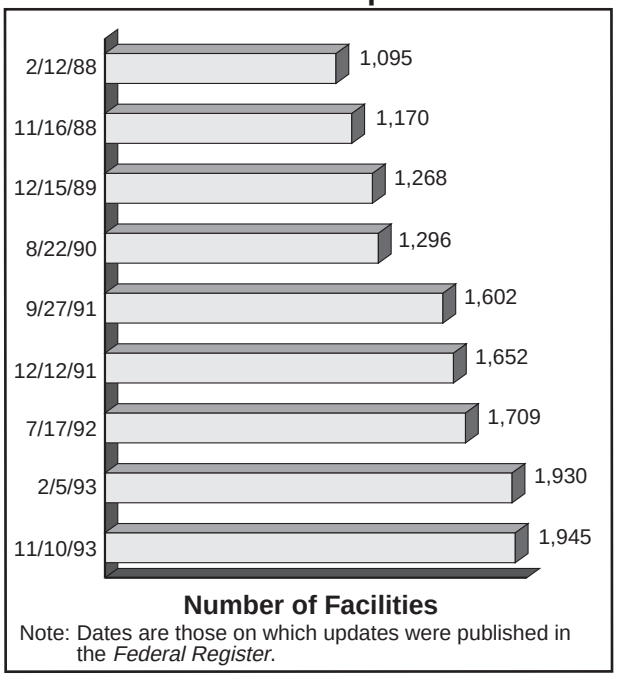
The November 10, 1993, update of the docket, which identifies the status of federal facility sites as of July 16, 1993, listed a total of 1,945 facilities. Of these sites, the Department of Defense (DOD) owned or operated 863 (44 percent) and the Department of the Interior (DOI) owned or operated 428 (22 percent). The remainder were distributed among 18 other federal departments, agencies, and instrumentalities. A breakdown of facilities on the docket by federal department or agency is illustrated in Exhibit 6.2-2.

### 6.2.2 Status of Federal Facilities on the NPL

The NPL distinguishes federal facilities from non-federal sites. NPL updates contain language that clarifies the roles of EPA and other federal departments and agencies with regard to federal facility sites. Consistent with Executive Order 12580 and the National Contingency Plan, EPA is typically not the lead agency for all federal facility sites on the NPL; federal agencies are usually lead agencies for their own facilities. EPA is, however, responsible for overseeing federal facility compliance with CERCLA.

As of the end of FY93, there were 143 federal facility sites on the NPL, including 123 final and 20 proposed sites. These sites included 18 proposed for listing and 7 sites listed as final during FY93.

**Exhibit 6.2-1**
**Number of Federal Facilities on the Hazardous Waste Compliance Docket**




Note: Dates are those on which updates were published in the *Federal Register*.

Source: Federal Agency Hazardous Waste Compliance Docket.

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Federal departments and agencies made substantial progress during FY93 toward cleaning up federal facility NPL sites. Activity at federal facility NPL sites during the year included the start of approximately 80 remedial investigation/feasibility studies (RI/FSs), 40 remedial designs (RDs) and 20 remedial actions (RAs). Also, 56 records of decision (RODs) were signed.

**Exhibit 6.2-2**
**Distribution of Federal Facilities on the Hazardous Waste Compliance Docket**

| | | |
|---|---|---|
| Department of Defense | 863 | (44%) |
| Department of the Interior | 428 | (22%) |
| Department of Agriculture | 122 | (6%) |
| Department of Transportation | 111 | (6%) |
| Department of Energy | 90 | (5%) |
| Ownership Not Yet Known | 76 | (4%) |
| Tennessee Valley Authority | 42 | (2%) |
| Corps of Engineers, Civil | 36 | (2%) |
| Veterans Administration | 34 | (2%) |
| United States Postal Service | 24 | (1%) |
| Department of Justice | 23 | (1%) |
| General Services Administration | 21 | (1%) |
| Environmental Protection Agency | 20 | (1%) |
| National Aeronautics and Space Administration | 17 | (1%) |
| Department of Commerce | 12 | (0.6%) |
| Department of Health and Human Services | 11 | (0.6%) |
| Department of the Treasury | 7 | (0.4%) |
| Department of Housing and Urban Development | 4 | (0.2%) |
| Central Intelligence Agency | 2 | (0.1%) |
| Department of Labor | 1 | (0.05%) |
| Small Business Administration | 1 | (0.05%) |
| TOTAL | 1,945 | |

Note: Percentages total less than 100% due to rounding.

Source: Federal Agency Hazardous Waste Compliance Docket.

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## 6.2.3 Interagency Agreements Under CERCLA Section 120

IAGs are the cornerstone of the enforcement program with regard to federal facility NPL sites. During FY93, six CERCLA IAGs were executed to accomplish hazardous waste cleanup at federal facility NPL sites. Of the 123 final federal facility sites listed on the NPL, 120 were covered by enforceable agreements by the end of the fiscal year.

IAGs between EPA and each responsible federal department or agency document some or all of the phases of remedial activity (RI/FS, RD, RA, operation and maintenance) to be undertaken at a federal facility NPL site. States are sometimes signatories to these agreements. IAGs formalize the procedure and schedule for submittal and review of documents and include a timeline for remedial activities, in accordance with the requirements of CERCLA Section 120(e). They also establish mechanisms to resolve disputes between the signatories. Furthermore, EPA can assess stipulated penalties for non-compliance with the terms of these agreements.

IAGs must comply with the public involvement requirements of CERCLA Section 117 and are enforceable by the states. Citizens may seek to enforce the agreements through civil suits. Penalties may be imposed by the courts against federal departments and agencies in successful suits brought by states or citizens for failure to comply with IAGs.

## 6.3 Federal Facility Initiatives

The growing awareness of environmental contamination at federal facilities has increased the public demand for facility cleanup. EPA has worked to establish priorities for clean-up programs to maximize cleanups with the finite resources available. In FY93, OFFE focused on priority issues including military base closure, acceleration of federal facility cleanups, interagency forums to address issues, and innovative technologies for cleanup.

### 6.3.1 Military Base Closure

Pursuant to the Base Realignment and Closure Act, 30 major installations were selected in FY93 for realignment or closure. Five of the installations were listed on the NPL, bringing the number of closing installations on the NPL to 20. Concurrent with Congressional action on the closures, the President submitted a Five-Point Plan to speed the economic recovery of communities with military bases slated for closure. EPA, DOD, the states, and local citizens are responsible for implementing the plan.

The Fast Track Clean-Up Program, part of the Five Point-Plan, focuses clean-up efforts on facilitating reuse of bases scheduled for closure. Program components, identified in a series of joint EPA/DOD conferences, include identifying uncontaminated parcels, accelerating cleanup, facilitating leasing agreements, encouraging removal actions, providing technical assistance at non-NPL bases, enhancing community involvement, and integrating cleanup with economic development. The program aims to maximize and expedite the reuse of bases scheduled for closure in a manner consistent with the requirements of CERCLA Section 120(h). EPA and DOD developed guidance, published as a DOD directive on September 9, 1993, for implementation of the Fast Track Clean-Up Program. Clean-up teams, which will be empowered to make decisions locally and quickly, are to be identified and trained in November 1993. EPA will dedicate clean-up teams at sites identified by DOD as priority reuse candidates and will support the teams by providing technical experts in areas such as hydrogeology, toxicology, ecological assessment, field support, and legal review.

EPA's approach in supporting DOD in the Fast Track Clean-Up Program was outlined in its Model Accelerated Clean-Up Program guidance. EPA will assign a Remedial Project Manager (RPM) to each installation with a clean-up team. The RPM will serve as an integral part of the clean-up team, spending significant amounts of time at the base. DOD supported EPA's efforts and agreed to commit 100 full-time equivalents to aid in achieving the objectives of the Fast Track Clean-Up Program. Most of the DOD resources have been assigned to EPA's Regional offices.

### 6.3.2 Accelerated Cleanups at Federal Facilities

OFFE developed draft guidance to identify components of the Superfund Accelerated Clean-Up Model that provide opportunities for speeding cleanup at federal facilities on the NPL. The guidance addresses site assessment, the impact of accelerated cleanup on the NPL, presumptive remedies, early and long-term actions, public involvement, and the effect of accelerated cleanup on existing federal facility IAGs.

### 6.3.3 Interagency Forums

The Federal Facilities Environmental Restoration Dialogue Committee (FFERDC), established in 1992 as an advisory committee under the Federal Advisory Committee Act, provides a forum for identifying and refining issues related to environmental restoration activities at federal facilities. The goal of the committee is to develop consensus on

recommendations for improving the process by which environmental restoration decisions are made for federal facilities.

During FY93, the FFERDC published an interim report (*Interim Report of the FFERDC: Recommendations for Improving the Federal Facilities Environmental Restoration Decision-Making and Priority-Setting Processes*) describing methods for improving the process by which federal agencies share information and involve affected parties in decision making and priority setting at federal facilities. Through the procedures outlined in the interim report, the FFERDC seeks to create an open, public, interactive process that originates at the local or facility level and extends through the entire federal hierarchy of departments, agencies, and offices that are part of the Executive Branch decision-making process. The committee's recommendations are intended to establish a standard consultation process and provide an outline of the procedures and ground rules necessary for the equitable involvement of all parties. Recommendations include creating site-specific advisory boards and developing information dissemination policies.

The interim report explicitly addresses priority setting in the event of a funding shortfall. During FY93, DOD and DOE began implementing many of the public involvement activities recommended in the report.

### 6.3.4 Innovative Technology Development

OFFE, in conjunction with the Technology Innovation Office (TIO) and the Office of Research and Development (ORD), worked toward establishing federal facilities as field research and development centers for applying innovative technologies for source reduction, pollution control, site investigation, and site remediation.

Through public-private partnership projects, EPA sought to measure the performance of innovative technologies. EPA, DOE, and the State of Florida began a public-private partnership in FY93 for the remediation of ground water at the DOE Pinellas Plant. At McClellan Air Force Base, EPA continued a public-private partnership project with the State of California, the Air Force, and private firms. OFFE and TIO also continued to support an ongoing public-private partnership project with the Air Force for using bioventing to remediate subsurface contamination from jet fuel spills. As of the end of FY93, the Air Force had proposed bioventing for over 100 sites around the nation.

In other FY93 activity, EPA continued implementation of the July 1991 memorandum of understanding (MOU) with DOE, DOD, DOI, and the Western Governors Association, examining issues and technology needs for environmental restoration and waste management in western states. Reports generated under the MOU identified barriers to technology development and addressed the need for a cooperative approach when developing technical solutions to environmental restoration and waste management problems. Pursuant to the MOU, the Develop On-Site Innovative Technologies (DOIT) Committee, established under the Federal Advisory Committee Act, was formed in 1993.

The DOIT Committee formed workgroups to address specific problem areas (mixed waste, military munitions waste, abandoned mine waste, and waste contaminants at military bases) and one general workgroup. The workgroups were to analyze technology demonstrations and solicit stakeholder involvement at federal facilities. In April 1993, the proposed Stakeholder Participation Plan was distributed to possible stakeholders with an invitation to participate in the five workgroups. After the workgroups met, the DOIT Committee convened in June 1993 to review preliminary workgroup reports, develop an interim management plan, and discuss project implementation. In addition, two roundtables (Regulatory and Institutional Barriers, Commercialization) were held in the fall of 1993 to assist the workgroups in developing recommendations.

## 6.4 CERCLA Implementation at EPA Facilities

Of the 1,945 sites on the Federal Agency Hazardous Waste Compliance Docket at the end of FY93, 20 were EPA-owned or operated. None of these EPA-owned or operated sites were listed on the NPL. A report on clean-up progress at these 20 facilities, as required by CERCLA Section 120(e)(5), is provided below.

### 6.4.1 Requirements of CERCLA Section 120(e)(5)

CERCLA Section 120(e)(5) requires an annual report to Congress from each federal department, agency, or instrumentality on its progress in implementing Superfund at its facilities. Specifically, the annual report to Congress is to include, but need not be limited to, the following items:

- *Section 120(e)(5)(A)*: A report on the progress in reaching IAGs under CERCLA Section 120(e)(2);
- *Section 120(e)(5)(B)*: The specific cost estimates and budgetary proposals involved in each IAG;
- *Section 120(e)(5)(C)*: A brief summary of the public comments regarding each proposed IAG;
- *Section 120(e)(5)(D)*: A description of the instances in which no agreement (IAG) was reached;
- *Section 120(e)(5)(E)*: A progress report for conducting RI/FSs required by CERCLA Section 120(e)(1) at NPL sites;
- *Section 120(e)(5)(F)*: A progress report for remedial activities at sites listed on the NPL; and
- *Section 120(e)(5)(G)*: A progress report for response activities at facilities that are not listed on the NPL.

CERCLA also requires that the annual report contain a detailed description, by state, of the status of each facility subject to this section. The status report must include a description of the hazards presented by each facility, plans and schedules for initiating and completing response actions, enforcement status (where applicable), and an explanation of any postponement or failure to complete response actions.

EPA has given high priority to maintaining compliance with CERCLA requirements at its own facilities. EPA uses its environmental compliance program to heighten regulatory awareness, identify potential compliance violations, and coordinate appropriate corrective action schedules at its laboratories and other research facilities for all environmental statutes.

EPA has also instituted an environmental auditing program of EPA facilities to identify potential violations of federal (including CERCLA), state, and local requirements. By performing these detailed facility analyses, EPA is better able to assist facilities in compliance.

### 6.4.2 Progress in Cleaning Up EPA Facilities Subject to Section 120 of CERCLA

At the end of FY93, the Federal Agency Hazardous Waste Compliance Docket listed 20 EPA-owned or operated facilities, including 4 sites added to the docket and 1 site removed from the docket during the fiscal year. Casmalia Resources in Casmalia, California; EPA Headquarters in the District of Columbia; the Brunswick Facility in Brunswick, Georgia; and the Philadelphia Site in Philadelphia, Pennsylvania, were added to the docket, and the Gulf Breeze Environmental Research Laboratory in Gulf Breeze, Florida, was deleted. Casmalia Resources, the Brunswick Facility, and the Philadelphia Site, however, may have been listed in error; EPA is currently investigating those listings.

EPA is required to report on progress at EPA-owned or operated sites in meeting Section 120 requirements for reaching IAGs, conducting RI/FSs at NPL sites, and undertaking response activities at NPL and non-NPL sites:

- EPA did not have any facilities listed on the NPL as of FY93; therefore, EPA has not entered into any IAGs for remediation that would require

## Exhibit 6.4-1
## Status of EPA Facilities on the Federal Agency Hazardous Waste Compliance Docket

| State | EPA Facility | Known or Suspected Problems | Project Status |
|---|---|---|---|
| AL | National Air and Radiation Environmental Laboratory (formerly known as the Eastern Environmental Radiation Facility (EERF)) | Contained soil and ground-water contamination | PA completed; ongoing monitoring and remediation activities. |
| AR | Combustion Research Facility | No contamination | PA completed 4/89; no further remedial action planned. |
| CO | National Enforcement Investigation Center | No contamination | PA completed 4/88; no further remedial action planned. |
| DC | EPA Headquarters | Small-quantity generator | Final removal of hazardous waste conducted 8/93; EPA to request change to non-handler generator status. |
| IL | Region 5 Environmental Services Division Laboratory | No contamination | PA completed 4/88; no further remedial action planned. |
| KS | EPA Mobil Incinerator | No contamination from mobile incinerator | No further remedial action planned; mobile incinerator removed from site. |
| KS | Region 7 Environmental Services Divison Laboratory | No contamination | PA completed 4/88; no further remedial action planned. |
| MD | EPA Central Regional Laboratory | No contamination | PA completed 4/88. SI completed; monitoring of site ongoing. |
| MI | Motor Vehicle Emission Laboratory | No contamination | PA conducted 3/90; no further remedial action planned. |
| NC | EPA Tech Center | No contamination | PA conducted 8/91; no further remedial action planned. |
| NJ | EPA Raritan Depot | No contamination that poses a threat to the environment | PA/SI prompted additional investigative work currently underway. |
| OH | AWBERC Facility | No contamination | PA completed 4/88; no further remedial action planned. |
| OH | Center Hill Hazardous Waste Engineering Research Laboratory | No contamination | PA completed 4/88; no further remedial action planned. |
| OH | Testing and Evaluation Facility | No contamination | PA completed 4/88; no further remedial action planned. |
| OR | EPA Laboratory | Small-quantity generator | Conditionally exempt from PA requirements. |
| TX | EPA Laboratory | Small-quantity generator | Conditionally exempt from PA requirements. |
| WA | Region 10 Environmental Services Divison Laboratory | Soil and sediment contamination attributable to DOD ownership | PA/SI completed. EPA requested that site be evaluated for listing on the National Priorities List. |

Source: Hazardous Waste Compliance Docket and the Office of Administration and Resources Management.

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reporting under CERCLA Sections 120(e)(5)(A), (B), (C), or (D).

- Because no EPA-owned or operated sites are listed on the NPL, EPA has not undertaken any RI/FSs or remedial activities at NPL sites that would require reporting under CERCLA Sections 120(e)(5)(E) and (F).
- EPA has evaluated and, as appropriate, undertaken response activities at the 17 EPA sites on the docket for which it is responsible. Exhibit 6.4-1 provides the status, by state, of EPA-owned or operated sites and identifies the types of problems and progress of activities at each site, as required by CERCLA Section 120(e)(5)(G).

EPA facilities that have undergone significant response activities in FY93 are discussed in detail below.

## National Air and Radiation Environmental Laboratory, Alabama

EPA's air and radiation laboratory formerly operated at a site near its current location at Gunter Air Force Base in Montgomery, Alabama. During operations at the original site, waste solvents, including xylene and benzene, were discharged into a pit adjacent to the laboratory building. The releases were identified by EPA's internal auditing program. Initially, the site was remediated by removing the accessible contaminated soil and replacing it with uncontaminated soil. In conjunction with the Underground Injection Control Program of the Alabama Department of Environmental Management, EPA is working to determine the extent of the resulting contamination and to develop an appropriate mitigation program. The Agency is monitoring the ground-water wells on the property regularly and initiating a program to pump ground water from the contaminated area. EPA is also evaluating the use of biological remediation to address any residual soil contamination.

## EPA Headquarters, District of Columbia

EPA Headquarters was reported as a small-quantity generator of hazardous wastes during FY93 because of the presence of unopened containers of photographic development chemicals. The final removal of the containers of hazardous waste occurred in August 1993. EPA is requesting a change from small-quantity generator status to non-handler generator status of this facility.

## EPA Central Regional Laboratory, Maryland

EPA conducted an on-site investigation of ground-water contamination at the EPA Central Regional Laboratory in Annapolis, Maryland. Although the State of Maryland is satisfied that hazardous substances have not been released into the environment and that further response action is not required, the Agency installed a homogenizing tank and continues to maintain monitoring wells at the site.

## EPA Raritan Depot, New Jersey

Originally, the Raritan Depot site was owned by DOD and used for munitions testing and storage. In 1963, the General Services Administration (GSA) took possession of the property and, in 1988, transferred approximately 200 acres of the site to EPA. Although residual contamination from past DOD and GSA activities at the facility persists, EPA has not stored, released, or disposed of any hazardous substances on the property.

A site investigation was conducted in FY91, following the discovery of a contaminated surface-water impoundment. The investigation resulted in the implementation of interim clean-up actions. Response activities have included spraying a rubble pile containing asbestos with a bituminous sealant; removing the liquid in the surface impoundment, excavating soil, installing a liner, and backfilling the impoundment with clean material; excavating and

storing munitions; and removing underground storage tanks. EPA expects that DOD will pursue additional clean-up work at the site.

## Region 10 Environmental Services Division Laboratory, Washington

EPA acquired the former Navy site from DOD in 1970 and used the land to construct an environmental testing laboratory in 1978. The property adjacent to the laboratory contains a rubble landfill that was covered by the Navy. The soil cover on the landfill has deteriorated, exposing construction material. A preliminary assessment (PA) and site investigation (SI), which revealed the presence of hazardous substances in the soil, sediment, and surface-water run off, was completed in FY93.

Because the site is a former Navy site, the Defense Environmental Restoration Program for Formerly Used Defense sites will provide funding for evaluating and correcting the hazardous conditions. EPA requested that the site be evaluated and proposed for listing on the NPL. The U.S. Army Corps of Engineers will lead the clean-up process and have requested funds to perform the RI/FS.